

EXHIBIT C

From: Marc Kaplan
Sent: Sunday, May 7, 2023 6:23 PM
To: David Grosby; Jocelyn Ma
Cc: Sonos-NDCA06754-service; LS3 Team; QE-Sonos3; Moulton, Libby; James Judah
Subject: Re: Sonos v. Google, No. 3:21-cv-6754-WHA -- Exhibit Lists and Demonstratives for 5/8 Witnesses

David,

We are reviewing the disclosed exhibits and demonstratives, and with respect to Dr. Almeroth's disclosed demonstratives, it appears that the vast majority of those demonstratives were not disclosed with his expert reports. Judge Alsup's standing order states:

Accordingly, at trial, the direct testimony of experts will be limited to the matters disclosed in their reports. New matters may not ordinarily be added on direct examination. This means the reports must be complete and sufficiently detailed. Illustrative animations, diagrams, charts and models may be used on direct examination only if they were part of the expert's report, with the exception of simple drawings and tabulations that plainly illustrate what is already in the report, which can be drawn by the witness at trial or otherwise shown to the jury. If cross-examination fairly opens the door, however, an expert may go beyond the written report on cross-examination and/or re-direct examination. By written stipulation, of course, all sides may relax these requirements.

We are objecting to Dr. Almeroth's disclosures that violate the Court's order, given that Sonos repeatedly refused to relax the Court's requirements on this issue, and we plan to alert the Court to this dispute.

Thank you,
Marc

From: David Grosby <grosby@ls3ip.com>
Date: Sunday, May 7, 2023 at 5:02 PM
To: Jocelyn Ma <jocelynma@quinnemanuel.com>
Cc: Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>, LS3 Team <LS3_team@ls3ip.com>, QE-Sonos3 <qe-sonos3@quinnemanuel.com>, Moulton, Libby <emoulton@orrick.com>, James Judah <jamesjudah@quinnemanuel.com>
Subject: Sonos v. Google, No. 3:21-cv-6754-WHA -- Exhibit Lists and Demonstratives for 5/8 Witnesses

[EXTERNAL EMAIL from grosby@ls3ip.com]

Jocelyn,

Please find attached the direct examination demonstratives for the witnesses identified yesterday.

Further, see below for their respective exhibit lists.

Nick Millington